

REMARKS

The indication that claims 3-12, 14-16, and 18-20 include patentable subject matter is acknowledged with thanks. In reliance thereon, claims 3, 4 and 7 have been amended into independent form by adding the subject matter of claim 1 thereto. Claim 6 (that had included the features of claim 4 plus other features) has been amended to depend from claim 4 without presenting any new issues.

Claims 13 and 17 were rejected as anticipated by MILES et al. 2001/0038138. Reconsideration and withdrawal of the rejection are respectfully requested.

With regard to claim 13, MILES et al. do not disclose a second guard ring in "said insulating layer" (the same insulating layer in which the first guard ring is located), or the first connections that are "in said insulating layer and connecting said first guard ring and said second guard ring to each other". The Official Action points to guard ring 6 in MILES et al. as the first guard ring and guard ring 8 as the second guard ring. However, as is apparent from Figure 3 of MILES et al., the guard ring 8 is not "in" the layer 13 in which the guard ring 6 is located. The layer 15 in which second guard ring 8 is located is not an insulating layer; layer 15 is silicon. Further, the connections 19, 18 between the guard ring 6 and the guard ring 8 in MILES et al. are not "in" layer 13, as is required by the claim.

Accordingly, claim 13 avoids the rejection under §102.

With regard to claim 17, MILES et al. do not disclose that the second guard ring does not overlap the first guard ring when viewed from a direction perpendicular to a surface of the substrate. As is apparent from Figure 3 of MILES et al., guard ring 6 overlaps guard ring 8 when viewed from a direction perpendicular to surface of the substrate (that is, from the top toward the bottom of the drawings).

Accordingly, claim 17 avoids the rejection under §102.

Claims 1-2 were rejected as unpatentable over MILES et al. in view of KITADA et al. 2003/0160262. Withdrawal of the rejection is respectfully requested.

In MILES et al., the first area is shielded from the second area. MILES et al. disclose the guard ring which surrounds the low voltage area of the integrated circuit. On the other hand, the purpose of KITADA et al. is to improve breakdown voltage of a diode device. KITADA et al. disclose the skill used for adjusting the concentration profile of the impurity in the semiconductor and discloses that the guard ring is a part of the device (transistor device 202). Therefore, the art and the purpose of MILES et al. are different from KITADA et al. There is neither suggestion nor motivation to combine MILES et al. and KITADA et al. If MILES et al. and KITADA et al. are combined, the guard ring of KITADA et al. would be disposed in the sensitive low voltage area and in the high voltage area that are

disclosed in MILES et al. The structure of the guard ring that is disposed in each of the areas is the same as the structure shown by Figures 2-4 in MILES et al., because guard ring 27 is located in epitaxial layer (silicon layer) 12 in KITADA et al. This structure is clearly different from the invention of claim 1. Accordingly, claims 1-2 avoid the rejection under §103.

In view of the present amendment and the foregoing remarks, it is believed that the present application has been placed in condition for allowance. Reconsideration and allowance are respectfully requested.

Please charge the fee of \$600 for the three extra independent claims added herewith, to Deposit Account No. 25-0120.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON



Thomas W. Perkins, Reg. No. 33,027
745 South 23rd Street
Arlington, VA 22202
Telephone (703) 521-2297
Telefax (703) 685-0573
(703) 979-4709

TWP/lk